## Remarks

The specification has been amended on pages 9 to 11 to correct a typographical error and two incorrect line references to the program listings in Appendices A-F. The program listings themselves are being replaced with program listings that are identical except that the line numbering begins with line 1, as the references in the body of the specification assume.

Claims 1-11 remain rejected, and claims 12-17 are newly rejected, under 35 U.S.C. § 102(b) as being anticipated by the online reference<sup>1</sup> entitled "Persistence" ("WebReference"). Again, this rejection is respectfully traversed, as applicants' invention clearly differentiates on the basis of features expressly recited in the claims.

In applicants' claimed invention, a <u>first</u> hypertext document—in the specification, frameset document 902 with referenced documents 904 and 906 (Fig. 9)—is displayed to a user for entry of user data, while a <u>new</u> hypertext document—in the specification, save document 800 (Fig. 8)—containing the user data is generated in response to a user command to save the data. The first document can thus be tailored for data entry (Fig. 3), while the second document can be tailored for saving the entered data (Fig. 8).

WebReference describes a number of "behaviors" of Microsoft Internet Explorer that allow for data persistence. Perhaps the most relevant such behavior is saveSnapshot, described on the page<sup>2</sup> of WebReference entitled "Hard Disk Persistence". As described in the first paragraph of that page, saveSnapshot is a behavior "that enables persistence of an HTML file when you save it onto your hard disk". The user may save an HTML document containing a partially completed form, using the browser's File/Save As function, and later retrieve the form with the entered data using the File/Open function.

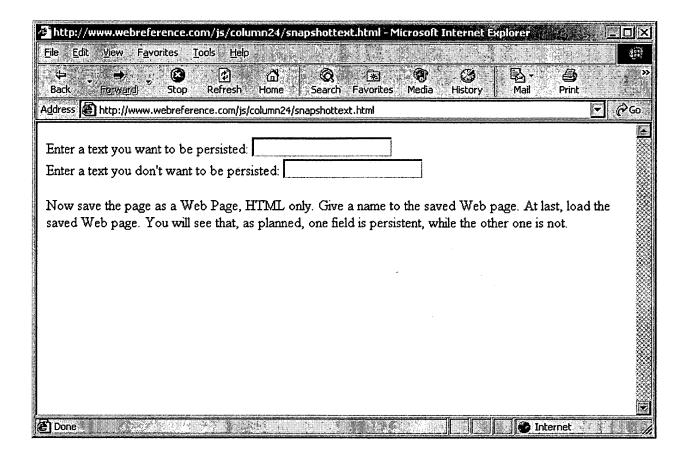
While the saveSnapshot behavior shares some similarities with applicants' claimed invention, it differs fundamentally in that only a single document is involved. Rather than dynamically

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<sup>&</sup>lt;sup>1</sup> This reference may be found at <a href="http://www.webreference.com/js/column24/">http://www.webreference.com/js/column24/</a>.

<sup>&</sup>lt;sup>2</sup> This page may be found at http://www.webreference.com/js/column24/snapshot.html.

generating a <u>new</u> document containing user data and displaying a save prompt, the saveSnapshot behavior uses the <u>original</u> document for this purpose. Thus, in the example given for this behavior, the same document (snapshottext.html) is used both to accumulate user data and to store it in persistent form at a selected location on the user's hard drive. This document appears on the screen as follows:



Note that this document contains not only a data entry prompt ("Enter a text you want to be persisted:"), but also a save prompt ("Now save the page as a Web Page, HTML only.") and a retrieve prompt ("At last, load the saved Web page") as well. This results in a rather cluttered appearance and contrasts with applicants' scheme, in which the data entry window 300 (Fig. 3) corresponding to frameset document 902 (Fig. 9) is tailored for data entry (with only buttons for Save and Load), while the save window 400 (Fig. 4) corresponding to save document 800 (Fig. 8) is tailored for saving the entered data.

Accordingly, WebReference does not teach dynamically creating a <u>new</u> hypertext document containing user data and displaying a message prompting the user to save the new document using a local save function as claimed by applicants. Accordingly, claims 1-17 distinguish patentably over WebReference.

Claims 13, 15 and 17 further distinguish patentably over WebReference by virtue of their recitation that the script function contained in the new hypertext document becomes active when loaded to repopulate the first hypertext document with said user data. Even assuming, for the sake of argument, that the script block

```
<SCRIPT CLASS="saveSnapshot" ID="persistentScript">
  var persistentVariable;
</SCRIPT>
```

described on the "Hard Disk Persistence" page is a script function, it does not repopulate a first document with user data as claimed by applicants. Rather, it only ensures the persistence of certain variables in the same document in which it appears. This script block is thus to be contrasted with the script function saveFields() shown in Appendix D of the specification, which is replete with the names and values of variables to be repopulated to the header file 904.

## **Conclusion**

For the foregoing reasons, applicants respectfully submit that claims 1-17 distinguish patentably over the reference cited by the Examiner. Applicants therefore respectfully request entry of this amendment and reconsideration of the application as amended.

Respectfully submitted,
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